

EXHIBIT A

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**SUPERIOR COURT OF NEW JERSEY
LAW DIVISION: OCEAN COUNTY**

**ROSE ANN KEVE and RICHARD
KEVE,**

Plaintiffs,

VS.

**LOWE'S COMPANIES, INC.; JOHN
DOE(S) and/or XYZ CO(S).,**

Defendants,

DOCKET NO:

Civil Action

COMPLAINT

Plaintiffs ROSE ANN KEVE and RICHARD KEVE, residing at 1086a Canterbury Dr., Township of Manchester, County of Ocean and State of New Jersey complaining of the defendants, alleges and says:

FIRST COUNT

1. At all times hereinafter mentioned, defendants LOWE'S COMPANIES, INC.; JOHN DOE(S) and/or XYZ CO(S), same being fictitious as the correct names of said persons partnerships, corporations and/or other business entities have not as yet been ascertained, jointly and/or severally, owned, leased, maintained, managed, supervised and/or were otherwise in control of a certain Lowe's store at 1053 Route 70 in the Township of Manchester, County of Ocean and State of New Jersey

2. On or about January 25, 2020, plaintiff ROSE ANN KEVE tripped

and fell on a piece of a pallet on the floor inside the store near the linoleum area.

3. At or about the same time, defendants aforesaid, jointly and/or severally, were negligent, careless and/or reckless in the ownership, leasing, maintenance, management, supervision, and/or control of the aforementioned premises, including said floor area causing plaintiff to fall.

4. As a direct and proximate result of the negligence of the defendants aforesaid, jointly and/or severally, plaintiff ROSE ANN KEVE was caused to sustain severe and permanent injuries to various parts of her body, including the nervous system. Plaintiff was, and will in the future be, caused to sustain great pain and suffering, including mental anguish. As a result of her injuries, plaintiff has been, and will in the future be, compelled to expend great sums of money for medical aid and attention in an effort to cure herself. Plaintiff also sustained a loss of wages.

WHEREFORE, plaintiff ROSE ANN KEVE hereby demands judgment against the defendants aforesaid, jointly and/or severally, for compensatory damages together with interest, costs of suit and counsel fees.

SECOND COUNT

1. Plaintiff, RICHARD KEVE, hereby repeats, reiterates and realleges each and every allegation contained in the First Count as if set forth at length herein and makes them a part hereof.

2. Plaintiff, RICHARD KEVE, avers that he was, at the time of the aforementioned incident, and at the present time is, the husband of the plaintiff, ROSE ANN KEVE.

3. By reason of the aforesaid, plaintiff, RICHARD KEVE, has been, and will in the future be, deprived of the comfort, companionship, consortium and society of his wife, plaintiff, ROSE ANN KEVE.

WHEREFORE, plaintiff, RICHARD KEVE, demands judgment against the defendants aforesaid, jointly and/or severally, for compensatory damages together with interest, costs of suit and counsel fees

JURY DEMAND

Plaintiff herein hereby demands a trial by jury as to all issues.

DEMAND FOR ANSWERS TO UNIFORM INTERROGATORIES

Pursuant to R.4:17-2, plaintiff(s) hereby demand defendant(s) to provide answers to Form C and C(1) or C(2), which ever may be applicable, Uniform Interrogatories within the time prescribed by the New Jersey Court Rules.

DEMAND FOR INSURANCE INFORMATION

Pursuant to R.4:10-2(b) demand is hereby made of defendant(s) to disclose whether there are any insurance agreements or policies under which an insurance company or firm may be liable to satisfy any judgment which may be entered against the defendant(s) in this action. If so, advise the undersigned under oath or certification (a) name and address of insurer(s), (b) policy number(s), (c) dates of coverage, (d) named insureds personal injury liability limits, and (e) claim number pertaining to this cause of action.

CERTIFICATION

I certify that the matter in controversy is not the subject of any other action in any court or of a pending arbitration proceeding and, to the best of my knowledge, none is contemplated at this time.

DESIGNATION OF TRIAL COUNSEL

Pursuant to R. 4:25-4, the undersigned is hereby designated as trial counsel.



MARK S. HARRISON, ESQ.
Attorney for Plaintiff